



U.S. Department of Justice

United States Attorney
Eastern District of New York

271 Cadman Plaza East
Brooklyn, New York 11201

April 23, 2025

By ECF

Honorable Eric N. Vitaliano
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Barrios v. U.S. Dep't of Homeland Security*, No. 25-cv-1759 (Vitaliano, J.)

Dear Judge Vitaliano:

This Office represents the U.S. Department of Homeland Security ("DHS") and DHS Secretary Kristi Noem (collectively, "Respondents") in the above-referenced matter. Defendants write respectfully in response the Court's Order dated April 8, 2025 directing Respondents "identify and attach as exhibits all immigration proceedings relating to [Petitioner Miguel Vaamondes Barrios ("Barrios")], including any removal proceedings and appeals to the Board of Immigration Appeals," *see* ECF Order dated Apr. 8, 2025, and also in accordance with the Court's separate Order, dated April 18, 2025, directing Respondents' to "file with the Court copies of all . . . documents [responsive to the Apr. 8, 2025 Order] in the possession of government's counsel on or before April 23, 2025," *see* ECF Order dated Apr. 18, 2025. In accordance with those Orders, Respondents electronically filed the following documents earlier today:

- Declaration of Jessica Ann Harold dated April 23, 2025 ("Harold Decl."), and all of the Exhibits annexed thereto, ECF No. 8.

Respondents further respectfully submit that they are in possession of audio recordings of immigration hearings before Department of Justice, Executive Office for Immigration Review ("EOIR"). *See* Harold Decl., ¶ 8. In order to aid the Court, since the audio recordings cannot be filed on ECF, this Office is in the process having those recordings transcribed into certified transcripts. This Office hopes to have that transcription process completed by April 29, 2025 so that the transcripts can be filed at that time. To the extent the Court would also like copies of the audio recordings themselves, Respondents can submit them to Chambers under separate cover upon request. Respondents thank the Court for its time and consideration of this matter.

Respectfully submitted,

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